

Fill in this information to identify the case:

Debtor 1 Daniel Corrigan

Debtor 2 Jennifer Fox-Corrigan
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-14784 MDC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Lakeview Loan Servicing, LLC

Court claim no. (if known): 8-4

Last 4 digits of any number you use to identify the debtor's account: 4136

Property address:

1036 Sunset Street
Trainer, PA 19061

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08 / 01 / 2023 **

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Daniel Corrigan and Jennifer Fox-Corrigan
First Name Middle Name Last Name

Case Number (if known): 18-14784 MDC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

*/s/ Mark A. Cronin

Date 08/16/2023

Mark Cronin
16 Aug 2023, 10:57:30, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**** *FHA FINAL TERMS* APPROVED WORKOUT: FHA RECOVERY STANDALONE PARTIAL CLAIM
MODIFIED UPB: \$69,941.04 EFFECTIVE DATE: 8/01/2023 PAYMENT AMOUNT: \$ 870.29 TOTAL DLQ
PAYMENTS: \$ 3,481.16 CORPORATE ADVANCE: \$ 0.00 ESCROW SHORTAGE: \$ 236.**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Daniel Corrigan
Jennifer Fox-Corrigan aka
Jennifer Fox**
Debtor(s)
Lakeview Loan Servicing, LLC
Movant
vs.
**Daniel Corrigan
Jennifer Fox-Corrigan aka Jennifer Fox**
Debtor(s)
Kenneth E. West,
Trustee

BK NO. 18-14784 MDC
Chapter 13
Related to Claim No. 8-4

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Mark A. Cronin of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on August 16, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Daniel Corrigan
1036 Sunset Street
Trainer, PA 19061

Jennifer Fox-Corrigan aka Jennifer Fox
1036 Sunset Street
Trainer, PA 19061

Attorney for Debtor(s) (via ECF)
Brad J. Sadek, Esq.
Sadek Law Offices, LLC
1500 JFK Boulevard
Ste 220
Philadelphia, PA 19102

Trustee (via ECF)
Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail:

Dated: August 16, 2023

/s/ Mark A. Cronin
Mark A. Cronin Esquire
Attorney I.D. 58240
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
mcronin@kmlawgroup.com